

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and JOHN
MEINERS, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

NATIONAL ASSOCIATION OF REALTORS,
COMPASS, INC., EXP WORLD HOLDINGS,
INC., REDFIN CORPORATION, WEICHERT
REALTORS, UNITED REAL ESTATE, and
DOUGLAS ELLMAN, INC.,

Defendants.

No. 4:23-cv-00788-SRB

Honorable Stephen R. Bough

**DEFENDANT UNITED REAL ESTATE’S MOTION TO STRIKE CLASS ALLEGATIONS
TO PROTECT ARBITRATION AND CLASS ACTION WAIVER RIGHTS**

COMES NOW Defendant United Real Estate (“United”), by and through the undersigned counsel, and pursuant to Fed. R. Civ. P. 12(f) and 23(d)(1)(D), moves the Court to strike the class allegations in the Complaint.

In support of this Motion, United submits contemporaneously its Suggestions in Support of its Motion to Strike Class Allegations to Protect Arbitration and Class Action Waiver Rights.

WHEREFORE, Defendant United Real Estate respectfully requests that the Court strike the class allegations in the Complaint or, at a minimum, exclude from the class any individual who agreed to arbitrate their dispute, engage in any other alternative dispute resolution, or waive their right to proceed via class action litigation, and grant United any further relief that the Court deems just and proper.

Dated: February 26, 2024

Respectfully submitted,

/s/ James D. Lawrence

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Attorneys for Defendant United Real Estate

CERTIFICATE OF SERVICE

I certify that on February 26, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ James D. Lawrence

James D. Lawrence

Attorney for Defendant United Real Estate